

1 TERRY ROSS, CASB No. 58171
terry.ross@kyl.com
2 AUDETTE PAUL MORALES, CASB No. 216631
audette.morales@kyl.com
3 KEESAL, YOUNG & LOGAN
A Professional Corporation
4 400 Oceangate, P.O. Box 1730
Long Beach, California 90801-1730
5 Telephone: (562) 436-2000
Facsimile: (562) 436-7416
6
7 Attorneys for Defendants
WACHOVIA SECURITIES, LLC and MARK WIELAND
8
9

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 VIOLETTA ETTARE,) Case No.: C 07 4429 PVT
13)
Plaintiff,)
14 vs.) **STIPULATION TO FURTHER**
15 JOSEPH E. BARATTA, an individual,) **EXTEND TIME FOR DEFENDANTS**
16 TBIG FINANCIAL SERVICES, INC., form) **JOSEPH E. BARATTA, TBIG**
of business unknown, WACHOVIA) **FINANCIAL SERVICES, INC.,**
17 SECURITIES, LLC, a Delaware Limited) **WACHOVIA SECURITIES, LLC, AND**
Liability Company, MARK WIELAND, an) **MARK WIELAND TO RESPOND TO**
18 individual, and DOES 1-25,) **COMPLAINT**
19 Defendants.)
20)

21 WHEREAS, Defendants JOSEPH E. BARATTA, TBIG FINANCIAL
22 SERVICES, INC., WACHOVIA SECURITIES, LLC, and MARK WIELAND
23 ("Defendants") removed this action to this Court on or about August 27, 2007; and

24 WHEREAS, counsel for Defendants and counsel for Plaintiff VIOLETTA
25 ETTARE ("Plaintiff") have since engaged each other in dialogue concerning various
26 procedural and substantive issues, which may result in the filing of motions by
27 Defendants and Plaintiff; and
28


1 WHEREAS, Plaintiff, by and through her counsel, and in light of such
2 discussions, has agreed to an extension of time to answer or otherwise respond to the
3 Complaint; and

4 WHEREAS, Local Rule 6-1(a) of the United States District Court Northern
5 District of California provides that the parties may stipulate to extend the time for
6 responding to the Complaint;

7 IT IS HEREBY STIPULATED by and between Plaintiff and Defendants,
8 through their respective counsel of record, that Defendants shall have an extension to
9 and including September 24, 2007, in which to answer or otherwise respond to Plaintiff's
10 Complaint. Nothing contained herein shall be deemed a waiver of any parties' rights.

11
12 IT IS SO STIPULATED.

13
14 DATED: September 6, 2007


CHRISTOPHER C. COOKE
STEPHEN S. WU
COOKE KOBRICK & WU LLP
Attorneys for Plaintiff
VIOLETTA ETTARE

15
16
17
18
19 DATED: _____, 2007

GILBERT R. SEROTA
HOWARD RICE NEMEROVSKI CANADY
FALK & RABKIN
Attorneys for Defendants
JOSEPH E. BARATTA and TBIG
FINANCIAL SERVICES, INC.

20
21
22
23
24
25
26 [SIGNATURES CONTINUE ON NEXT PAGE]

1 WHEREAS, Plaintiff, by and through her counsel, and in light of such
2 discussions, has agreed to an extension of time to answer or otherwise respond to the
3 Complaint; and

4 WHEREAS, Local Rule 6-1(a) of the United States District Court Northern
5 District of California provides that the parties may stipulate to extend the time for
6 responding to the Complaint;


7 IT IS HEREBY STIPULATED by and between Plaintiff and Defendants,
8 through their respective counsel of record, that Defendants shall have an extension to
9 and including September 24, 2007, in which to answer or otherwise respond to Plaintiff's
10 Complaint. Nothing contained herein shall be deemed a waiver of any parties' rights.

11
12 IT IS SO STIPULATED.

13
14 DATED: _____, 2007


CHRISTOPHER C. COOKE
STEPHEN S. WU
COOKE KOBRICK & WU LLP
Attorneys for Plaintiff
VIOLETTA ETTARE

15
16
17
18
19 DATED: Sept. 6, 2007


GILBERT R. SEROTA
HOWARD RICE NEMEROVSKI CANADY
FALK & RABKIN
Attorneys for Defendants
JOSEPH E. BARATTA and TBIG
FINANCIAL SERVICES, INC.

20
21
22
23
24
25
26 [SIGNATURES CONTINUE ON NEXT PAGE]

1
2
3
4
5 DATED: September 6, 2007


TERRY ROSS
AUDETTE PAUL MORALES
KEESAL, YOUNG & LOGAN
Attorneys for Defendants
WACHOVIA SECURITIES, LLC and
MARK WIELAND